

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ELIZABETH CHAN, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
TRANSPORTATION, *et al.*,

Defendants.

Case No. 23-cv-10365-LJL

[rel. 1:24-cv-01644-LJL]

[rel. 1:24-cv-000367-LJL]

DECLARATION OF SEAN CARNEY

I, Sean Carney, declare under penalty of perjury that the following statements are true and correct:

1. My name is Sean Carney, and I have been a resident of Norwood, NJ, since 1998.
2. I am a violinist whose main source of income is working on Broadway shows in mid-town Manhattan. Because of the lack of mass transit and my late working hours, driving to New York City has been my only means of transportation into and out of New York City for the past 35 years. I already pay \$17 a day, six days a week to cross the George Washington Bridge and, under the Congestion Pricing Plan, would be forced to pay an additional \$15-dollar toll.
3. However, my main concern with congestion pricing is the potential environmental issues it will cause due to traffic being diverted from Manhattan to New Jersey communities like Norwood. This increase in pollutants and toxins is of special concern to me as I've been battling a motor neuron disease for the last twenty years called CIDP, or Chronic Inflammatory demyelinating Polyneuropathy. Being exposed to higher than normal levels of toxins like Carbon Monoxide and Nitrogen Oxide could only hurt my fight against this disease.

The primary symptoms of this disease are sensory and motor loss in my extremities, or arms, hands, legs, and feet. This is of great concern to me as my living is made as a professional violinist and if exposed to these higher levels of pollutants, I'm very concerned the progression of my symptoms will make it impossible for me to continue playing and making a living.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 15, 2024
New York, New York

A rectangular box containing a handwritten signature in dark ink. The signature appears to read "Sean M. Carney" in a cursive script.

Sean Carney